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December 2, 2021

VIA ECF

The Honorable Katharine H. Parker
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. This joint letter is submitted on behalf of all parties to seek a brief adjournment of the upcoming deposition deadlines, specifically the deadline to complete Plaintiff's deposition by December 7, 2021 (Dkt. No. 89) and the deadline to complete remaining fact depositions by January 28, 2022 (Dkt. No. 85).

The parties are in the process of meeting and conferring to see whether they can reach any agreement to narrow the topics that need to be covered at the upcoming depositions. In addition, the parties are meeting and conferring concerning a host of discovery disputes that have recently arisen and will affect the upcoming depositions. Among these issues, there are disputes between the parties as to the appropriate length of the upcoming depositions (including Plaintiff's deposition on December 7, 2021), the propriety of Defendants' withholding of documents based on claims of privilege and the propriety of their redactions to various documents, the propriety of Plaintiff's responses to various of Defendants' Requests for Admission, certain issues Defendants have identified relating to Plaintiff's November 5, 2021 delivery of various boxes to counsel's office, and Defendants' opposition to reviewing one of Defendant Robert De Niro's cell phones for responsive ESI. All of these disputes are anticipated to impact the upcoming depositions in this case.

Resolving these matters before depositions commence will promote judicial economy and facilitate an orderly deposition process; for instance, resolving disputes now over the length of depositions and the scope of the parties' productions will avoid the need to recall witnesses later. The parties are hopeful that they will be able to resolve certain of these disputes on their own, but they need some additional time to do so. In addition, the parties anticipate that Court intervention may be required to resolve at least some of their disputes, including but not limited to some of the disputes referenced above.

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Given that the Court has already scheduled a status conference for December 15, 2021 (Dkt. No. 90), the parties request that the Court adjourn the upcoming deposition deadlines and reset deadlines at that conference. The parties will be prepared to present any unresolved discovery disputes to the Court during the December 15, 2021 conference, and deposition deadlines can be reset at that time based on the outcome of that Court conference.

Given that Plaintiff's deposition is currently scheduled for Tuesday, December 7, 2021, all parties would appreciate if the Court could rule on the requested adjournment by this coming Friday, December 3, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Alexandra Harwin", with a stylized flourish at the end.

Alexandra Harwin